

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Edward A. Zraick, Jr., *et al.*,

Defendants.

Adv. Pro. No. 10-05257 (SMB)

**FIFTH STIPULATION AND ORDER EXTENDING TIME FOR ZRAICK
DEFENDANTS TO DEPOSE TRUSTEE'S EXPERTS BRUCE G. DUBINSKY
AND LISA M. COLLURA ON THEIR SUPPLEMENTAL REPORTS**

Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC and under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Edward A. Zraick, Jr., Nancy Zraick, Patricia DeLuca, and Karen Rich (collectively, "Defendants"), by and through their counsel Hunton Andrews Kurth LLP, hereby stipulate and agree as follows:

RECITALS

A. On March 4, 2020, the above-referenced adversary proceeding was referred to mediation;

B. On March 20, 2020, the Court entered the Order Denying Zraick Defendants' Motion *In Limine* To Strike The Supplemental Expert Reports Of Bruce G. Dubinsky And Lisa M. Collura (ECF No. 130) providing, among other things, that Defendants may depose the Trustee's experts Bruce G. Dubinsky and Lisa M. Collura on their supplemental expert reports on or before May 19, 2020 (the "Supplemental Expert Deposition Deadline");

C. The parties and the mediator reached a settlement in principle and entered into four prior stipulations extending the Supplemental Expert Deposition Deadline by sixty days, thirty days, thirty days, and thirty days, respectively, through and including October 16, 2020, to allow the parties to finalize the prospective settlement, which stipulations were so-ordered by the Court (ECF Nos. 131 through 134); and

D. The parties are continuing to finalize the prospective settlement and desire to extend the Supplemental Expert Deposition Deadline by an additional thirty days, through and including November 16, 2020.

AGREEMENT

NOW THEREFORE, it is hereby stipulated and agreed that:

1. The Supplemental Expert Deposition Deadline is hereby extended by thirty (30) days, through and including November 16, 2020.

2. This Court shall retain exclusive jurisdiction over the enforcement, implementation, and interpretation of this Order.

Dated: October 8, 2020

BAKER & HOSTETLER LLP

/s/ Maximillian S. Shifrin

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Counsel for Defendants

SO ORDERED this 9th day of October 2020

/s/ STUART M. BERNSTEIN

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE